

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

UNITED STATES OF AMERICA

v.

**T'MICHAEL JONES,
CHARLES HAIRE, TRAVIS BRUTON,
JESSIE KIMBLE, BERNARD
GRAHAM, MICHAEL MAUGERI,
AND STANLEY GROOMES**

CRIMINAL NO. 1:11-CR-2-WLS

VIOLATION: 21 U.S.C. § 846 i/c/w

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(a)(1)(A)(ii)

21 U.S.C. § 841(b)(1)(B)(iii)

18 U.S.C. § 2

THE GRAND JURY CHARGES:**COUNT ONE**

From on or about July, 2008, the exact date being unknown to the Grand Jury and continuing to on or about July 29, 2010, both dates being approximate and inclusive, in the Albany Division of the Middle District of Georgia and elsewhere within the jurisdiction of this court, the defendants,

**T'MICHAEL JONES,
CHARLES HAIRE,
TRAVIS BRUTON,
JESSIE KIMBLE,
BERNARD GRAHAM,
MICHAEL MAUGERI AND
STANLEY GROOMES,**

unlawfully, knowingly, willfully, and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit: possession with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine and fifty (50) grams or more of a mixture or substance containing a detectable amount of cocaine base also known as "crack cocaine"; schedule II controlled substances; all in violation of Title 21, United States Code, Section 846 i/c/w Title 21, United States Code, Sections 841 (a)(1), 841 (b)(1)(A)(ii) and (b)(1)(A)(iii) and Title 18, United States Code Section 2.

COUNT TWO

That on or about February 16, 2009, in the Albany Division of the Middle District of Georgia,

CHARLES HAIRE,

did unlawfully, knowingly, willfully and intentionally distribute a Schedule II controlled substance, to wit: five (5) grams or more of a mixture and substance containing a detectable amount cocaine, i.e., cocaine base also known as "crack cocaine;" all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT THREE

That on or about April 1, 2009, in the Albany division of the Middle District of Georgia, the defendant,

CHARLES HAIRE,

did unlawfully, knowingly, willfully and intentionally distribute a Schedule II controlled substance, to wit: five (5) grams or more of a mixture and substance containing a detectable amount cocaine base also known as "crack cocaine;" all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

A TRUE BILL.

/s/
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

MICHAEL J. MOORE
UNITED STATES ATTORNEY

Michael K. Dennard
MICHAEL DENNARD
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 10th day of

February A.D. 20 11

Nora Paul
Deputy Clerk